

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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STEPHEN BECKMAN,

Plaintiff,

v.

BULL HN INFORMATION  
SYSTEMS INC.,

Defendant.

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Civil Action No. 03-12567-NG

**JOINT MOTION TO APPROVE STIPULATION AND PROTECTIVE ORDER**

The parties to the above-captioned litigation, Plaintiff Stephen Beckman (“Beckman”) and Defendant Bull HN Information System Inc. (“Bull HN”), hereby request that the Court approve and enter as an Order the Stipulation and Protective Order Regarding Personnel Files and Workforce Data of Bull HN Information Systems Inc. As grounds therefore, the parties state that discovery in this case may include the exchange of confidential personnel documents and workforce data. In order to protect the confidentiality of such information, the parties have entered into the attached Stipulation and Protective Order (Exhibit 1).

STEPHEN BECKMAN,

BULL HN INFORMATION SYSTEMS INC.,

By his attorney,

By its attorneys,

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Dated: January 18, 2005